

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re: ANDREW W. LENTZ
 DEBORAH L LENTZ

Debtor(s)

CHAPTER 13

JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE

Movant

vs.

ANDREW W. LENTZ
DEBORAH L LENTZ

CASE NO: 1-21-00119-HWV

Respondent(s)

TRUSTEE'S MOTION TO CONVERT CASE TO CHAPTER 7

AND NOW, on February 9, 2023, Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney, Douglas R. Roeder, Esquire, moves this Honorable Court for conversion of the above-captioned Chapter 13 bankruptcy case in accordance with Section 1307(c) of 11 U.S.C., due to failure to file a confirmable plan. An amended plan was due on January 14, 2023.

Notice of hearing and other instructions are included with this Motion.

WHEREFORE, Movant requests this Honorable Court to enter an Order of Court converting the above-captioned case to Chapter 7 in accordance with 11 U.S.C. Sec 1307(c).

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire

ID: 80016

Attorney for Trustee

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Suite A, 8125 Adams Drive

Hummelstown, PA 17036

Phone: (717) 566-6097

email: droeder@pamd13trustee.com

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on February 9, 2023, I served a copy of this Motion to Convert and Proposed Order on the following parties by 1st Class mail from Hummelstown, PA, unless served electronically.

Served Electronically

MICHAEL J CSONKA ESQUIRE
166 SOUTH MAIN STREET
KERRSTOWN SQUARE
CHAMBERSBURG PA 17201-

UNITED STATES TRUSTEE
SUITE 1190
228 WALNUT STREET
HARRISBURG, PA 17101

Served by First Class Mail

ANDREW W. LENTZ
DEBORAH L LENTZ
2033 PARKVIEW AVE
RED LION PA 17356

I certify under penalty of perjury that the foregoing is true and correct.

Date: February 9, 2023

/s/ Vickie Williams
Office of the Standing Chapter 13 Trustee
Jack N. Zaharopoulos
Suite A, 8125 Adams Dr.
Hummelstown, PA 17036
Phone: (717) 566-6097
email: info@pamd13trustee.com

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ORDER CONVERTING CASE

Upon consideration of the Trustee's Motion to Convert, it is hereby Ordered that the above-captioned bankruptcy be and hereby is converted to a Chapter 7.